



1 Thomas H. Bienert, Jr., State Bar No. 135311
tbienert@bmkattorneys.com
2 Kenneth M. Miller, State Bar No. 151874
kmiller@bmkattorneys.com
3 Anthony R. Bisconti, State Bar No. 269230
tbisconti@bmkattorneys.com
4 BIENERT, MILLER & KATZMAN, PLC
5 903 Calle Amanecer, Suite 350
San Clemente, California 92673
6 Telephone (949) 369-3700
7 Facsimile (949) 369-3701

8 Attorneys for James Larkin

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION

12 CV18-6742-RGK(MMAx)

13 In the Matter of the Seizure of:

Case No. :

18-MJ-00722

14 Any and all funds held in [REDACTED]
15 [REDACTED] Account(s) xxxx1889,
xxxx2592, xxxx1938, xxxx2912, and,
16 xxxx2500.

17 **NOTICE OF RELATED CASES**
18 **PURSUANT TO L.R. 83-1.3**

19 [Filed concurrently herewith are the following:
20 *Notice of Motion and Motion to Vacate or*
21 *Modify Seizure Warrants; Declarations of*
22 *James Larkin, Michael Lacey, John Brunst,*
23 *Scott Spear, Margaret Larkin, Troy Larkin,*
24 *Ramon Larkin, and Antoinette Thomas; Request*
25 *for Judicial Notice]*
26
27
28

Pursuant to Local Rule 83-1.3, James Larkin hereby provides notice of the following related cases (collectively with the instant case, the “Related Cases”), each of which is also pending in the United States District Court for the Central District of California:

- Case No. 2:18-mj-00712;
- Case No. 2:18-mj-00713;
- Case No. 2:18-mj-00715;
- Case No. 2:18-mj-00716;
- Case No. 2:18-mj-00718;
- Case No. 2:18-mj-00719;
- Case No. 2:18-mj-00720;
- Case No. 2:18-mj-00721;
- Case No. 2:18-mj-00723;
- Case No. 2:18-mj-00724;
- Case No. 2:18-mj-00751;
- Case No. 2:18-mj-00797;
- Case No. 2:18-mj-00798;
- Case No. 2:18-mj-00996;
- Case No. 2:18-mj-00997;
- Case No. 2:18-mj-01427; and
- Case No. 2:18-mj-01863.

The Related Cases arise from the same transactions, happenings, and/or events. The Related Cases all involve civil seizure warrants for assets that are allegedly proceeds from the operation of Backpage.com. All of the seizure warrants are based on the same (or very similar) probable cause allegations. And the owners of all the seized assets intend to move to vacate these seizure warrants the same grounds. Thus, there is a substantial overlap of legal and factual issues, as well as interested parties, among the Related Cases. Consequently, the Related Cases call for determination of the same or substantially related or similar questions of law and fact. As a result, and for the reasons set forth more fully

1 below, hearing the Related Cases by different judges would entail a substantial duplication
2 of labor.

3 Given the substantial factual and legal overlap of the seizures conducted in the
4 Related Cases, the challenges to those seizures, in this case and each of the Related Cases,
5 will likely raise the same or substantially similar issues. Accordingly, Mr. Larkin submits
6 that all of Related Cases should be consolidated and resolved in a single forum, before this
7 Court.

8
9 Dated: July 30, 2018

BIENERT, MILLER & KATZMAN, PLC

10 By: /s/ Thomas H. Bienert

11 Thomas H. Bienert

12 Kenneth M. Miller

13 Anthony R. Bisconti

14 Attorneys for James Larkin

15
16
17
18
19
20
21
22
23
24
25
26
27
28
440772-1